

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Steven Himmelman)	Case No. 24-00574
)	
Debtor(s))	CHAPTER 7
)	
)	Judge Deborah L. Thorne

**MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE OR TO REQUEST
DETERMINATION OF DISCHARGEABILITY OF DEBT**

The creditor, David Ocomo (“the creditor”), by and through counsel, and in support of Motion to Extend Time to Object to Discharge or to Request Determination of Dischargeability of Debt pursuant to Fed. R. Bankr. P. 4004 and 4007, states to the court as follows:

1. The court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. The debtor(s) filed a petition for relief under Chapter 11 of the Bankruptcy Code on 1/16/24.
4. The case was converted to Chapter 7 on 8/14/24.
5. The last day to object to discharge is 5/30/2025.
6. On 7/10/24, the court entered an order authorizing examination of certain entities by creditors David Ocomo and Canobinoti, LLC pursuant to Fed. R. Bankr. P. 2004.
7. The creditors have issued a number of subpoenas, but received no response from some of the entities.
8. The creditors are in the process of filing motions to compel and need additional time to conduct investigations.

WHEREFORE, creditor David Ocomo requests that the court extend the time to object to discharge or to request determination of the dischargeability of debt to July 31, 2025, and grant the creditor such other relief as just and proper.

Respectfully submitted,

/s/ Xiaoming Wu
Borges & Wu, LLC.
53 W. Jackson Blvd., Suite 462
Chicago, IL 60604
312-853-0200